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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

The above-captioned matter came before the Court on May 8, 2006 for status. The defendant was represented by Geoffrey Hansen and the government was represented by William C. Martin, Assistant United States Attorney. Upon the defendant's request to file a motion to suppress in this case, the Court ordered the defendant to file his motion by May 30, 2006. The government was given until June 6, 2006 to file its response. At that time the defendant waived his desire to file a reply brief and the Court then set June 12, 2006 at 10:00 A.M. for argument on the motion to suppress. The parties now hereby stipulate and agree that the date for the oral argument on the motion to suppress be continued to July 10, 2006 at 10:00 A.M. to allow the

1 defendant to file a reply to government's response.

2 The parties represent that the hearing should be continued until July 10, 2006, in order to
3 both accommodate the defendant request to file a reply brief as well as accommodate the impact
4 on the government counsel's calendar as a result of the defendant's request. Under the revised
5 schedule, as agreed to by the parties, the government would have until June 13, 2006 to file its
6 response to the motion to suppress and the defendant would have until June 20, 2006 to file a
7 reply.

8 The parties also stipulate and request that an exclusion of time until July 10, 2006 be
9 granted under the Speedy Trial Act, 18 U.S.C. § 3161(h)(1)(F). The time should be excluded
10 based upon the defendant's request to file a pretrial motion in this case; and the period excluded
11 would include the date of filing of the motion through the conclusion of the hearing on the
12 motion.

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14 SO STIPULATED

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16 DATED: June 6, 2006

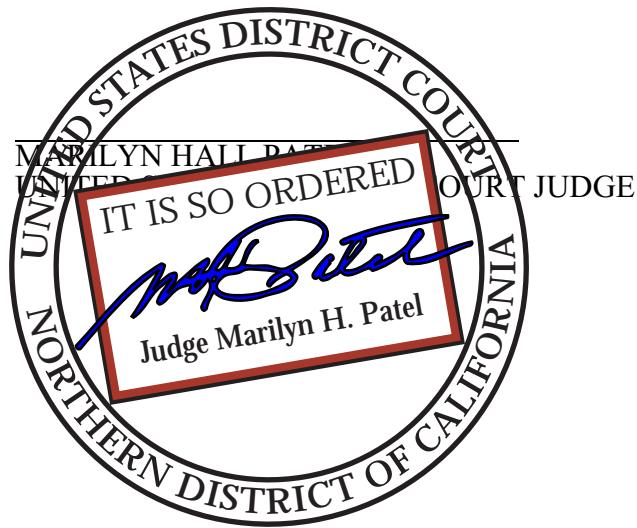
/s/
17 GEOFFREY HANSEN
Attorney for Defendant

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19 DATED: June 6, 2006

/s/
20 WILLIAM C. MARTIN
Assistant United States Attorney

21 SO ORDERED.

22 DATED: June 6, 2006



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STIPULATION AND [PROPOSED]
ORDER CONTINUING ORAL ARGUMENT
and EXCLUDING TIME
CR 06-00190 MHP